

Message

From: Partridge, Charles [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=27DA56DA9A12472787EF56077099CF36-PARTRIDGE, CHARLES]
Sent: 12/12/2019 1:51:19 PM
To: Burgess, Michele [Burgess.Michele@epa.gov]
Subject: Fwd: Blunt talk about Community Involvement and Relations--Superfund, Butte, Montana

Sent from my iPhone

Begin forwarded message:

From: John Ray [Ex. 6 Personal Privacy (PP)]
Date: December 12, 2019 at 5:51:23 AM MST
To: "Greene, Nikia" <Greene.Nikia@epa.gov>, John Ray [Ex. 6 Personal Privacy (PP)], "Wardell, Christopher" <Wardell.Christopher@epa.gov>, "Vranka, Joe" <vranka.joe@epa.gov>, "Mutter, Andrew" <mutter.andrew@epa.gov>, "Smidinger, Betsy" <Smidinger.Betsy@epa.gov>, "Partridge, Charles" <Partridge.Charles@epa.gov>, Karen Sullivan <ksullivan@bsb.mt.gov>, "Barnicoat, Dana" <Barnicoat.Dana@epa.gov>, "Bohan, Suzanne" <bohan.suzanne@epa.gov>
Subject: Fw: Blunt talk about Community Involvement and Relations--Superfund, Butte, Montana

I got a message that this had not gone through.
So I send again. If you did receive the original, please excuse this duplicate.
Please see message below.
John Ray

----- Forwarded Message -----

From: John Ray [Ex. 6 Personal Privacy (PP)]
To: Nikia Greene <greene.nikia@epa.gov>; Joe Vranka <vranka.joe@epamail.epa.gov>; Andrew Mutter <mutter.andrew@epa.gov>; Dana Barnicoat <barnicoat.dana@epa.gov>; Charles Partridge <partridge.charles@epa.gov>; Karen Sullivan <ksullivan@bsb.mt.gov>; Betsy Smidinger <smidinger.betsy@epa.gov>; Christopher Wardell <wardell.christopher@epa.gov>; bohan.suzanne@epa.gov <bohan.suzanne@epa.gov>; John Ray [Ex. 6 Personal Privacy (PP)]
Sent: Thursday, December 12, 2019, 5:39:13 AM MST
Subject: Blunt talk about Community Involvement and Relations--Superfund, Butte, Montana

In conversations yesterday with Dana and Andrew, I indicated that I would submit my thoughts as to how the EPA could more effectively get out in front of the Health Study frenzy in Butte. The following are my thoughts. I do not mean to be presumptuous as the EPA has an excellent team in place. But I am afraid that the narrative is slipping away from the agency and a narrative not to the agency's liking is emerging. Anyway, please accept the following as meant to help the agency in responding to this furor. I believe the agency is committed to producing a good cleanup in Butte and I don't want to see that message lost.

Dr. John W. Ray

I read this morning's Montana Standard article where Charlie and Nikia are quoted extensively in response to Hailer and McDermott, who are also quoted.

Well, the battle lines are now drawn. The question will now be asked as was asked long ago in Harlan County Kentucky during the union/coal company wars: "What side are you on?" There also was a letter to the editor today from a former member of the Council of Commissioners, echoed by online Montana Standard comments, that there is a serious health problem that the EPA and MDEQ are ignoring.

Before these two narratives get set in stone I think it might be better to step back a moment and examine how the agency is relating to the public.

My estimate of the public perceptions that is borne out by conversations I have had lately in Butte is that once again the EPA is impervious to any information that does not support what the agency already believes. Every time a new study comes out that appears to question the agency, the EPA's reaction is to reject the study out of hand is the public perception. Several people indicated to me yesterday that the Yoda Cartoon on Facebook that you have seen is an accurate depiction of the situation.

I don't believe that this is a fair narrative but it is becoming the prevailing narrative, one I don't think that the agency wants.

I would urge that the narrative be shifted to one that more closely resembles EPA reality:

1. EPA is committed to protecting public health from the harmful effects of exposure to the toxics of concern in Butte.
2. EPA has diligently investigated and continues to investigate the health effects, potential and actual, of exposure to the toxics of concern.
3. EPA maintains a constant review process of peer reviewed literature related to exposure to the toxics of concern.
4. In terms of the Hailer and McDermott study of manganese, zinc and copper meconium, EPA finds that the levels reported in the study are not out of the acceptable, average levels.
5. **BUT, EPA WELCOMES any relevant information that may question the agency position and will, fairly and accurately, investigate the new information.**

6. If the new information warrants, changes in the cleanup of Butte will be made.

The last two are most important.

If we get locked into an us versus them situation, the community involvement process becomes ossified and unproductive.

To be blunt, there is widespread mistrust of the EPA in Butte. There is mistrust of government in general but EPA has a credibility problem in the community. That has improved recently to a degree but I don't want to see the progress lost.

The following are some thoughts that I had about trying to make sense for the public of all of these competing and conflicting health studies that produce different results that serve to confuse the public. My goal would be to have EPA seen as an honest broker of public discussion and the sharing of information.

The Butte Health Department can help immensely in this regard. DEQ Should be more active.

Greater use of groups such as CTEC should be made.

To the extent that EPA comes across as having already made up its mind, efforts at community outreach are compromised. To the extent that EPA comes across as defensive, community outreach is eviscerated.

I am not saying this is reality from the perspective of the agency; but it is reality from the public perspective. We don't want a repeat of the Stacie Barry community involvement fiasco that greatly damaged EPA.

It is time for EPA to take charge of the narrative.

Overall

I would suggest that the agency present a big picture focus that seeks to answer this one question: ***Has Superfund been effective in reducing threats to public health posed by the toxics left behind in Butte by past mining activity?***

Taking an overall approach will be more effective than just responding to individual health studies. Responding to individual brush fires makes it hard to get ahead. More reports that are questioning the efficacy of the cleanup will be forthcoming.

It is better to take a big picture focus where all of these studies get folded into the bigger public health picture.

Answering this question could encompass the following general topics:

1. Prior to Superfund, what was the health threat status of Butte Vis a Vis the toxics of concern? In other words, what was the baseline from which EPA worked? Now, granted, Superfund was triggered in Butte by *threats* to public health posed by the toxics of concern more than actual disease traceable to the toxics of concern. Nevertheless, there is data to suggest what conditions were like in Butte. For example, blood lead levels in children prior to RMAP were elevated. There were unreclaimed waste areas. The Pit was filling. The Pole Plant was unreclaimed. Silver Bow Creek was much polluted. And so on. (This could be short—one or two paragraphs in a written document.

2. What has Superfund done that has improved conditions here? How have conditions improved? This would be a very general summary of all that has been done. Short and to the point.

3. What is scheduled to be done in the future? Again, short and to the point.

4. ***What do we know about Butte's public health Vis a Vis the toxics of concern now?*** What don't we know and how will we find out? Here the studies that are out there could be briefly discussed. Looking at all the studies are there any general conclusions that can be reached?

5. ***A statement that the Superfund process is not static.*** If new information is produced that warrants additional remediation activities, EPA has the power to see that these are performed even after Records of Decision and Consent Decrees. Here there could also be a statement of EPA's strong commitment to get the cleanup right and to protect health and the environment.

Types of Activities

A. Produce a fact sheet that would address 1-5 with particular emphasis on #s 4 and 5. This could be distributed in local schools, churches, at the Health Department, Community Health Services, Action, Inc., doctor's offices and clinics, etc.

B. Hold a public forum sponsored by a neutral party like CTEC that would discuss the state of Butte's public health Vis a Vis the toxics of concern. This forum could include a representative of EPA, ATSDR, CDC, local

Health Department, MDEQ and DPHHS and a local doctor and a member of the public that has followed this issue.

C. Offer to speak to local service clubs and groups such as school groups about the status of Butte's health Vis a Vis the toxics of concern.

D. Get CTEC to do something productive by, as an independent voice, facilitating the discussion. To the extent third parties not connected directly to EPA are involved, the more trust there will be. CTEC would have to get out of its comfort zone of meetings at the Archives.

E. Build personal relationships with the constituencies and opinion leaders on Superfund. This goes a long way in a small town like Butte.

F. Make use of social media.

G. Make use of the internet and perhaps create a public health in Butte site that can be a clearinghouse of information.

Right now the public perception is that Superfund has had little efficacy in terms of improving things in Butte; that the agency is impervious to public comment; Butte is not a health place to live and that citizens cannot trust the agency. This is an incorrect narrative; but it is the narrative in place.

I think that it is time to change that narrative.

Dr. John W. Ray